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VIA ECF

Hon. Gregory H. Woods
United States District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

Re: Ravi v. Citigroup Global Markets Holdings Inc., 1:21-cv-02223-GHW-KNF (S.D.N.Y.)

Dear Judge Woods:

We write on behalf of Defendant Citigroup Global Markets Holdings Inc. ("CGMHI") to respectfully notify the Court that Plaintiffs' objection (ECF No. 34 (the "Objection")) to Magistrate Judge Fox's report recommending dismissal of Plaintiffs' Amended Complaint (ECF No. 31 (the "R&R")) appears to have been authored by an individual named David Kirk, who is a *pro se* (non-attorney) litigant pursuing a similar claim against CGMHI that is pending before Judge Carter in this District. *See Kirk v. CGMHI*, No. 20-cv-07619-ALC (S.D.N.Y.) (the "*Kirk Action*").

The meta-data fields contained in Plaintiffs' Objection indicate that the "author" of the document is "David Kirk." The meta-data fields in Plaintiffs' December 6, 2021 letter (ECF No. 32), which sought an extension of Plaintiffs' time to file the Objection, also indicate the "author" was "David Kirk."¹ Mr. Kirk has attempted to represent other *pro se* litigants in several *pro se* actions he has coordinated filing against CGMHI through a social media site (*see Kirk Action* ECF Nos. 70-72, 86). Mr. Kirk has previously purported to correspond on behalf of the Ravi Plaintiffs in this action (*see id.* ECF No. 72, ¶ 5, Ex. 7). Judge Carter has previously ordered that Mr. Kirk "may not act on behalf of any of the other *pro se* plaintiffs in cases already filed or yet to be filed" (*see id.*, ECF No. 45, Hr'g Tr. at 8:3-12).

CGMHI is simultaneously notifying Judge Carter of Mr. Kirk's continued submission of filings in other courts on behalf of other *pro se* litigants.

Respectfully submitted,

/s/ Samuel J. Rubin

Samuel J. Rubin

Cc: Umashankar Ravi (*via* ECF)
Saritha Ravi (*via* ECF)

¹ The meta-data field for Plaintiffs' Objection is set forth in the screenshot annexed hereto as Exhibit A. The meta-data field for Plaintiffs' December 6, 2021 letter requesting an extension of their time to file the Objection is annexed hereto as Exhibit B. The meta-data fields for both of these filings can also be observed directly by the Court from the CM-ECF PACER system by accessing the filings at issue and selecting the "Document Properties" view from the terminal used to view the filing.